

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT POOLEY,

Defendant.

CASE NO. 2:21-CR-111 WBS

DECLARATION OF FREDERICK E. COOPER V

I, Frederick E. Cooper V, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am a System Administrator with the Computer Crimes Unit of the U.S. Department of Transportation-Office of Inspector General. I have been a DOT-OIG Systems Administrator since June 2011. Initially, I worked in the Information and Technology Department. In 2017, I transferred to the Computer Crimes Unit.
2. Assistant United States Attorney Katherine T. Lydon requested that I analyze the data extracted from the image of the computer seized from Parachute Center with serial number Z3TQ24TJ. From now on in this declaration, when I refer to “the computer,” I mean the computer with serial number Z3TQ24TJ. Specially, she asked me to identify data tending to show the persons exercising dominion and control over the computer and particular locations within the computer, and data tending to show how private or public the computer and its folders were.
3. Below is some information I was able to gather responsive to that request. This is working information only, and not the product of a full forensic analysis.
4. The system name of the computer was “BILL-HP”. A system name is typically assigned by the owner of the computer while first setting up the computer. Here, when the computer was first set up on November 15, 2013, the system name was set as “BILL-HP”. The Registered

- Owner was also set to “Bill”.
5. Homegroup sharing was enabled on the computer. Homegroup sharing capabilities allow people logged into other computers on the same network to remotely access files and folders on the computer. The computers within the homegroup are not required to enter a username and password every time they access something shared within the homegroup.
 6. There was no password required to log into the Bill user account. At the time of imaging, there were three user-created accounts on the computer: Bill (3,260 logins), UPSTestAdmin (3 logins), and Xerox (0 logins). Xerox was the only account that had a password. The password for the Xerox account was 1111.
 7. I reviewed lists compiled using a program called Axiom of (1) various accounts accessed from the computer, and (2) various passwords saved on the computer and the corresponding accounts/websites. These lists contained accounts and saved passwords which, based on the account names and/or associated email addresses, appeared to belong to multiple different people. In addition to several with variations on Rob Pooley’s name, Bill Dause’s name, the paractr@softcom.net, and others, the Chrome Browser had saved passwords with respect to various websites for usernames including the following (with the full email addresses omitted for privacy): erikadufort@*****.***; gabbycurrie@*****.***; and florajeau.
 8. I identified five Apple iOS devices which backed up at some point to the computer. The Apple iOS devices had information associated with them, including Device Phone Name and Device Phone Number. For privacy, I only included the last four digits of the phone number in the list below:

Device Phone Name	Device Phone Number
Bill’s iPhone	***-***-1162
Katherine’s iPhone	***-***-5726
Bill & Kathy’s iPhone	***-***-5726
iPad	***-***-1136
Bill & Kathy’s iPhone	***-***-4480

9. I examined certain file structures on the computer, including the file path: This PC > OS (I:) > Users>Bill>Documents. Folders in that file path are reflected in the below screenshot:

This PC > OS (I:) > Users > Bill > Documents












Name	Date modified	Type	Size
AC43	11/15/2013 12:24 PM	File folder	
Any Audio Converter	12/31/2015 7:26 PM	File folder	
Beech 99	6/8/2017 4:20 PM	File folder	
David's research	8/3/2014 1:40 PM	File folder	
Lew's Thesis	12/3/2016 6:44 PM	File folder	
M24	11/15/2013 12:25 PM	File folder	
Mail - kdmanifest57@hotmail.com_files	9/15/2017 4:12 PM	File folder	
My Music	11/15/2013 11:19 AM	File folder	
My Pictures	11/15/2013 11:19 AM	File folder	
My Stationery	11/15/2013 12:25 PM	File folder	
My Videos	11/15/2013 11:19 AM	File folder	
Optimizer Pro	3/28/2014 6:52 PM	File folder	
Parachute center docs	9/20/2017 3:01 PM	File folder	
Rob's Docs	12/31/2017 4:10 PM	File folder	
Scans	12/22/2014 3:46 PM	File folder	
temp	11/15/2013 12:25 PM	File folder	
Think Manuals	11/15/2013 12:25 PM	File folder	
Updater5	11/15/2013 12:25 PM	File folder	
USPA Instructor	9/6/2016 4:12 PM	File folder	
vector manual	11/15/2013 12:25 PM	File folder	
WDC	11/15/2013 12:25 PM	File folder	

10. The Desktop of the computer reflects folders and documents, including the following. This list only shows the folders and/or documents within the screen capture area.

> This PC > OS (I:) > Users > Bill > Desktop >				
Name	Date modified	Type	Size	
Bills phone music	11/27/2017 6:33 PM	File folder		
Bill's Videos	3/31/2017 2:31 PM	File folder		
Cessna in Field	11/11/2016 6:36 PM	File folder		
Kathys pics 23517	5/23/2017 5:14 PM	File folder		
music mp3	1/1/2016 5:21 PM	File folder		
New folder	12/28/2017 12:55 PM	File folder		
Phone photos	12/30/2015 6:33 PM	File folder		
Rig Spreadsheet	1/29/2018 3:54 PM	File folder		
scan	9/5/2017 5:00 PM	File folder		
Scan 2	9/12/2017 4:31 PM	File folder		
USPA_Forms_Manuals	5/2/2015 4:17 PM	File folder		
AFF Information	5/11/2015 4:43 PM	Adobe Acrobat D...	46 KB	
CD Drive - Shortcut	9/5/2017 4:53 PM	Shortcut	1 KB	
Classic Solitaire	12/21/2013 4:07 PM	Shortcut	2 KB	
desktop	1/9/2018 11:45 AM	Configuration sett...	1 KB	
Documents - Shortcut	11/15/2013 12:22 PM	Shortcut	2 KB	
IFLY Instructors	9/26/2016 6:55 PM	Adobe Acrobat D...	61 KB	
Jan Randa Dahl Arrest Warrant Letter	12/18/2017 5:20 PM	Adobe Acrobat D...	92 KB	
Jan Randa Dahl	11/10/2017 2:49 PM	Adobe Acrobat D...	182 KB	
Jason Putnam	12/28/2017 5:15 PM	Adobe Acrobat D...	38 KB	
Kim Bo Larson	1/17/2018 4:19 PM	Adobe Acrobat D...	217 KB	
Lodi Loop	7/31/2017 4:54 PM	Adobe Acrobat D...	101 KB	
Log in to your PayPal account	8/19/2015 2:12 PM	Internet Shortcut	1 KB	
Microsoft Fix it	11/20/2013 7:54 PM	Internet Shortcut	1 KB	
pic from Arizona	3/5/2016 2:39 PM	JPG File	102 KB	
Scan2-Zipped	9/12/2017 4:31 PM	Compressed (zipp...	153,135 KB	
scan-zipped	9/5/2017 5:00 PM	Compressed (zipp...	128,235 KB	
Tandem Parachute Investigation	8/13/2016 5:37 PM	QuickTime Movie	4,349 KB	
Training Program	3/9/2015 4:06 PM	Adobe Acrobat D...	1,698 KB	
WorkCentre 7500-custom-sw 061 121 22	12/24/2014 5:43 PM	Compressed (zipp...	223,542 KB	

11. Below is a screenshot of the file structure of the file path that led to the folder “New Docs” within the folder “Robs Docs” within the Bill user account. I viewed this folder on a computer set to East Coast time. Timestamps reflected in the below screenshot may not be accurate.

5 > This PC > OS (I:) > Users > Bill > Documents > Robs Docs > New Docs

Name	Date modified	Type	Size
 New A-License Prof Card	8/17/2015 10:36 PM	Adobe Acrobat D...	661 KB
 Yur_Rob Canopy Prof Card	8/17/2015 10:41 PM	Adobe Acrobat D...	290 KB
 Yuri Canopy Prof Card	8/17/2015 10:09 PM	Adobe Acrobat D...	197 KB
 Yuri Coach Prof Card Signed	8/17/2015 9:23 PM	Adobe Acrobat D...	1,492 KB
 Yuri D License App Signed	8/17/2015 10:50 PM	Adobe Acrobat D...	308 KB
 Yuri License App Signed	8/17/2015 10:45 PM	Adobe Acrobat D...	279 KB
 Yuri Signed Adjusted log Page 3	8/18/2015 12:38 AM	Adobe Acrobat D...	1,994 KB
 Yuri Signed Adjusted log Page 4	8/18/2015 12:38 AM	Adobe Acrobat D...	1,938 KB
 Yuri Tandem Prof Card Signed	8/17/2015 9:35 PM	Adobe Acrobat D...	2,404 KB
 Yuri UPT Rating Application and CCA	8/18/2015 12:30 AM	Adobe Acrobat D...	1,292 KB
 Yuri UPT Waiver	8/18/2015 12:32 AM	Adobe Acrobat D...	835 KB

16 Dated: February 20, 2024

17 By: Frederick E. Cooper V